1 2 3 4 5	HERRERA KENNEDY LLP Shawn M. Kennedy (SBN 218472) skennedy@herrerakennedy.com Bret D. Hembd (SBN 272826) bhembd@herrerakennedy.com 4590 MacArthur Blvd., Suite 500 Newport Beach, CA 92660 Tel: (949) 936-0900 Fax: (855) 969-2050	LIEFF CABRASER HEIMANN & BERNSTEIN, LLP Michael W. Sobol (SBN 194857) msobol@lchb.com Melissa Gardner (SBN 289096) mgardner@lchb.com 275 Battery Street, 29 th Floor San Francisco, CA 94111-3339 Tel: (415) 956-1000
6 7 8 9 10 11 12 13 14 15	HERRERA KENNEDY LLP Nicomedes Sy Herrera (SBN 275332) nherrera@herrerakennedy.com Laura E. Seidl (SBN 269891) lseidl@herrerakennedy.com 1300 Clay Street, Suite 600 Oakland, CA 94612 Tel: (510) 422-4700 Fax: (855) 969-2050 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP Rachel Geman (Pro Hac Vice) rgeman@lchb.com 250 Hudson Street, 8th Floor New York, NY 10013-1413 Tel: (212) 355-9500 Fax: (212) 355-9592	Fax: (415) 956-1008 BURNS CHAREST LLP Christopher J. Cormier (<i>Pro Hac Vice</i>) ccormier@burnscharest.com 4725 Wisconsin Avenue, NW Washington, DC 20016 Tel: (202) 577-3977 Fax: (469) 444-5002 BURNS CHAREST LLP Warren T. Burns (<i>Pro Hac Vice</i>) wburns@burnscharest.com 900 Jackson Street, Suite 500 Dallas, TX 75202 Tel: (469) 904-4550 Fax: (469) 444-5002
16 17 18 19 20	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION IN RE PLAID INC. PRIVACY LITIGATION Master Docket No.: 4:20-cv-03056-DMR	
 21 22 23 24 25 26 	THIS DOCUMENT RELATES TO: ALL ACTIONS	Hon. Donna M. Ryu Date: September 30, 2021 Time: 1:00 pm
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1 TO THE COURT AND EACH PARTY AND ATTORNEY OF RECORD FOR 2 **EACH PARTY:** 3 Pursuant to Civil Local Rule 7-3(d)(2), Plaintiffs respectfully inform the Court of a recent 4 decision relevant to their Motion for Preliminary Approval of Class Action Settlement, which was 5 heard on September 30, 2021. 6 Attached hereto as **Exhibit A** is a copy of the Order Granting Preliminary Approval of 7 Class Action Settlement and Approving Form and Content of Class Notice in In re: Zoom Video 8 Communications, Inc. Privacy Litigation, 5:20-cv-02155-LHK ("Zoom Video"), ECF No. 204, 9 which issued on October 21, 2021. Attached hereto as **Exhibit B** is the Motion for Preliminary 10 Approval of Proposed Class Action Settlement and Memorandum of Points and Authorities in 11 Support Thereof, Zoom Video, ECF No. 190. 12 In Zoom Video, U.S. District Judge Lucy Koh granted preliminary approval to a proposed 13 nationwide settlement under privacy-law claims (see Ex. A) where the plaintiffs presented an 14 estimated claims rate of between one and five percent for paid subscribers, and one and two 15 percent for non-paying subscribers, and recoveries of approximately \$34–35 and \$11–12, 16 respectively (see Ex. B at 15). 17 18 Dated: October 26, 2021 Respectfully submitted, 19 20 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 21 By: /s/ Rachel Geman Rachel Geman 22 23 Michael W. Sobol (SBN 194857) msobol@lchb.com 24 Melissa Gardner (SBN 289096) mgardner@lchb.com 25 275 Battery Street, 29th Floor San Francisco, CA 94111-3339 26 Tel: (415) 956-1000 27 Fax: (415) 956-1008 28

1		LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
2		Rachel Geman (<i>Pro Hac Vice</i>) rgeman@lchb.com
3		250 Hudson Street, 8th Floor
		New York, NY 10013-1413 Tel: (212) 355-9500
4		Fax: (212) 355-9592
5 6	Dated: October 26, 2021	HERRERA KENNEDY LLP
		By: /s/ Shawn Kennedy
7		Shawn M. Kennedy
8		Shawn M. Kennedy (SBN 218472)
9		skennedy@herrerakennedy.com
10		Bret D. Hembd (SBN 272826) bhembd@herrerakennedy.com
11		4590 MacArthur Blvd., Suite 500
12		Newport Beach, CA 92660 Tel: (949) 936-0900
13		Fax: (855) 969-2050
14		HERRERA KENNEDY LLP
		Nicomedes Sy Herrera (SBN 275332)
15		nherrera@herrerakennedy.com Laura E. Seidl (SBN 269891)
16		lseidl@herrerakennedy.com
17		1300 Clay Street, Suite 600 Oakland, California 94612
18		Telephone: (510) 422-4700
19		Fax: (855) 969-2050
20	Dated: October 26, 2021	BURNS CHAREST LLP
21		By: /s/ Christopher Cormier
22		Christopher J. Cormier
		Christopher J. Cormier (<i>Pro Hac Vice</i>) ccormier@burnscharest.com
23		4725 Wisconsin Avenue, NW
24		Washington, DC 20016 Tel: (202) 577-3977
25		Fax: (469) 444-5002
26		
27		
28		

1 2	BURNS CHAREST LLP Warren T. Burns (<i>Pro Hac Vice</i>)
3	wburns@burnscharest.com 900 Jackson Street, Suite 500
	Dallas, TX 75202
4	Tel: (469) 904-4550 Fax: (469) 444-5002
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6	Interim Co-Lead Class Counsel
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